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Servicing LLC now known as Ditech
15 *Financial LLC (erroneously named as*
Green Tree Services, LLC)
16

17 UNITED STATES DISTRICT COURT
18 DISTRICT OF NEVADA
19

20 Lee C. Kamimura, individually and all
others similarly situated,

21 Plaintiff,

22 vs.

23 Green Tree Services, LLC,
24 Defendant.
25

Case No. 2:16-cv-00783-APG-CWH

**STIPULATION FOR EXTENSION
OF DEADLINE TO FILE RULE 26
JOINT DISCOVERY PLAN**

**1ST REQUEST TO EXTEND
DEADLINE TO SUBMIT RULE 26
JOINT DISCOVERY PLAN**

26 Defendant Green Tree Servicing LLC, now known as Ditech Financial LLC
27 (“Ditech”) and Plaintiff Lee C. Kamimura (“Plaintiff”), collectively referred to
28 herein as the “Parties,” hereby stipulate to the following:

1 1. Plaintiff filed her Class Action Complaint For Damages Pursuant To
2 The Fair Credit Reporting Act, 15 U.S.C. § 1681, Et Seq. (“Complaint”) against
3 Defendant on April 8, 2016.

4 2. On May 2, 2016, Plaintiff filed a First Amended Complaint.

5 3. Plaintiff served Ditech with the First Amended Complaint on May 10,
6 2016.

7 4. On June 30, 2016, Ditech filed its motion to dismiss Plaintiff’s First
8 Amended Complaint.

9 5. The Parties have held their discovery conference under Fed. R. Civ. P.
10 26(f) within 30 days after Ditech’s motion to dismiss.

11 6. On July 15, 2016, Plaintiff filed a Second Amended Complaint
12 (“SAC”). ECF NO. 16.

13 7. Ditech’s response to Plaintiff’s SAC is due on August 22, 2016. ECF
14 No. 18.

15 8. After meeting and conferring regarding discovery, the parties have
16 agreed to stipulate to extend the deadline to submit their stipulated discovery plan
17 and scheduling order to forty-five (45) days after Ditech has filed an answer to the
18 SAC.

19 9. Due to the changing nature of the pleadings, the possibility of further
20 dispositive motions that may narrow the issues in the case, and the parties’
21 willingness to cooperate on efforts to streamline discovery in this matter, good cause
22 exists to delay extend the deadline for the Parties to submit a proposed discovery
23 plan until after Ditech has responded to the SAC.

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1 10. This is the first stipulation for extension of the deadline to file a
2 proposed discovery plan.

3 **IT IS SO STIPULATED.**

4 DATED this 17th day of August, 2016.

5 KAZEROUNI LAW GROUP, APC

McDONALD CARANO WILSON LLP

6
7 /s/ Michael Kind

/s/ Laura R. Jacobsen

8 Michael Kind

Laura R. Jacobsen

9 *Attorneys for Plaintiff*

*Attorneys for Defendant Green Tree
Servicing LLC, now known as Ditech
Financial LLC*

10
11
12 **IT IS SO ORDERED.**

13 DATED this August 19, 2016

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15 
16 _____
United States Magistrate Judge